

May 13, 2024

Via ECF
Honorable Sidney H. Stein
United States District Court Judge
And
Honorable Gabriel W. Gorenstein
United States Magistrate Judge

MEMORANDUM ENDORSED

United States District Court,
Southern District of New York -
500 Pearl Street
New York, NY 10007

Re: *Rosario v 2022 Eastchester LLC*
Case № 20-cv-09182-SHS
Settlement Progress

Dear Your Honors:

This office represents Defendants 2022 Eastchester LLC, Frank Cotto, and Noboru Takashima in this labor law action. After spending several hours (into the evening) on January 16, 2024 with Magistrate Judge Gorenstein, the parties reached an agreement to settle.

Defendants remain fully committed to their settlement agreement and hope to have the funds ready today to execute the agreement. Plaintiff's proposed terms included that the settlement funds be held in escrow with Defendants' counsel (as the settlement is reviewed by the Court). As of today, Defendants have half of the settlement funds. Defendants remain hopeful that they will secure the second half (hopefully later today). Defendants cannot sign the stipulation as written absent having the full settlement sum.

For weeks, the Defendants have scoured their resources to secure the second half of their settlement amount. I hoped to inform Plaintiff's counsel last week that Defendants secured the entire settlement amount; however, they continue their efforts.

For Defendants, I apologize for any inconvenience.

Thank you for your time and attention.

Respectfully submitted,



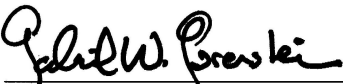
Steven Alexander Biolsi

Cc: via ECF
Attorneys For Plaintiffs Alexandra Rosario, Elizabeth Ortiz, and Amadou Camara
rw@rwapc.com
Robert Wisniewski
Robert Wisniewski P.C.

17 State Street
New York, NY 10004

Mr. Biolsi is directed to file a letter on ECF as to the status of this matter on or before May 15, 2024. Following the filing of that letter, the Court will address the extension of the Cheeks application deadline or the default judgment response deadline.

So Ordered.



GABRIEL W. KORENSTEIN
United States Magistrate Judge
May 13, 2024